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Attorney for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

|                           |   |                                  |
|---------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA, | ) | Case No. F04-0010 CR (RRB)       |
|                           | ) |                                  |
| Plaintiff,                | ) | <b>DEFENDANT RAYMOND F.</b>      |
|                           | ) | <b>WEGNER'S UNOPPOSED MOTION</b> |
| vs.                       | ) | <b>FOR LEAVE TO TRAVEL OUT</b>   |
|                           | ) | <b>OF STATE</b>                  |
| RAYMOND F. WEGNER and     | ) |                                  |
| JULIE M. WEGNER,          | ) |                                  |
|                           | ) |                                  |
| Defendants.               | ) |                                  |
| _____                     | ) |                                  |

Defendant Raymond F. Wegner, by and through counsel undersigned, respectfully moves this Court for an order modifying the conditions of his release. AS GROUNDS THEREFOR, Defendant states:

1. Defendant is currently out on bail.
2. As a condition of his release, defendant may not travel beyond the borders of the District of Alaska.
3. Defendant is in full compliance with all pre-trial conditions and United States Probation Officer Toni Ostanik does not oppose Defendant's request to travel outside of the

District of Alaska to Portland, Oregon, between April 22 through April 28, 2006 to attend the Freightliner Factory School in Portland, Oregon.

4. The government does not oppose the instant motion.

WHEREFORE, Defendant respectfully requests that this Honorable Court enter an order modifying the conditions of Raymond F. Wegner's release by authorizing him to travel outside the District of Alaska to Portland, Oregon, between April 22 through April 26, 2006.

RESPECTFULLY SUBMITTED, this 16<sup>th</sup> day of March, 2006.

WILLIAM A. COHAN, P.C.

By: /s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of March, 2006, I served a true and correct copy of the foregoing **DEFENDANT RAYMOND F. WEGNER'S UNOPPOSED MOTION FOR LEAVE TO TRAVEL OUT OF STATE**, upon the following via the CM/ECF system as follows:

TIMOTHY M. BURGESS  
United States Attorney  
STEPHEN COOPER  
Assistant U.S. Attorney  
Federal Building & U.S. Courthouse  
101 12<sup>th</sup> Avenue, Box 2, Room 310  
Fairbanks, Alaska 99701

Toni Ostanik, USPO  
United States Probation Office  
101 - 12<sup>th</sup> Avenue, Room 322  
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William P. Bryson, Esq.  
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Courtesy Copy:

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/s/  
\_\_\_\_\_  
Alicia Cisneroz